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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS  
RESPONSE TO THE COURT'S ORDER  
OF CONFERENCE TO FRAME *IN*  
*LIMINE* MOTIONS (DKT. 664)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal Portions of its Response to the Court’s Order of Conference to Frame *in Limine* Motions (Dkt.  
8 664) (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following  
9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Response	Portions highlighted in blue	Defendants

13 3. Waymo has filed portions of its Response under seal because it contains and refers to  
14 information that Defendants have designated confidential.

15 4. Waymo expects Defendants to file one or more declarations in accordance with the  
16 Local Rules.

18 I declare under penalty of perjury under the laws of the State of California and the United  
19 States of America that the foregoing is true and correct, and that this declaration was executed in San  
20 Francisco, California, on June 28, 2017.

22 By /s/ Lindsay Cooper  
23 Lindsay Cooper  
24 Attorney for WAYMO LLC

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven